UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

SHANNON C. BRAINARD,	§
Plaintiff,	§ § §
V.	§ CIVIL ACTION NO. 4:17-CV-01718
LUTECH RESOURCES, INC. AND LIFE INSURANCE COMPANY OF NORTH AMERICA,	§ JURY TRIAL DEMANDED BY PLAINTIFF
Defendants.	§ § §

DEFENDANT LUTECH RESOURCES, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S ORIGINAL COMPLAINT

Defendant Lutech Resources, Inc. ("Lutech") moves the Court to extend the deadline to file a responsive pleading to Plaintiff Shannon C. Brainard's ("Plaintiff") Original Complaint ("Complaint") (ECF No. 1). In support of Lutech's unopposed motion, Lutech submits the following:

- 1. On June 7, 2017, Plaintiff filed her Complaint. Lutech executed a Waiver of Service of Summons and, thus, the current deadline for Lutech to file a responsive pleading to the Complaint is August 7, 2017. (ECF No. 3.)
- 2. Plaintiff's Complaint also names Life Insurance Company of North America ("LINA") as a defendant. LINA executed a waiver of service of summons and, thus, its current deadline to file a response to the Complaint is September 25, 2017. (ECF No. 4.)
- 3. To keep the case's procedural status parallel, Lutech requests an extension of time in which to respond to the Complaint.
- 4. Further, Lutech requires additional time to review the documents and information related to the allegations in the Complaint in order to adequately respond.

- 5. The undersigned counsel conferred with Plaintiff's counsel regarding the relief sought, and Plaintiff's counsel does not object to the relief requested in this motion.
 - 6. No party would be prejudiced by the Court granting this unopposed motion.

WHEREFORE, Lutech respectfully moves the Court to extend the time in which it may respond to Plaintiff's Complaint, up to and including September 25, 2017.

Respectfully submitted,

/s/ Danielle K. Herring

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ATTORNEY FOR DEFENDANT LUTECH RESOURCES, INC.

CERTIFICATE OF CONFERENCE

I certify that on August 4, 2017, I spoke with Plaintiff's counsel via phone regarding the extension sought in this motion. Plaintiff's counsel indicated that she is unopposed to this motion.

/s/ Danielle K. Herring

Danielle K. Herring

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of August 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing upon the counsel below:

Dalton D. Harris III Laura Richards Sherry Clayton L. Parry The Harris Firm, P.C. 5050 West Lovers Lane Dallas, TX 75209

Attorneys for Plaintiff

/s/ Danielle K. Herring

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